

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:18CR00810 JAR
)	
LACIA ALLEN,)	
)	
Defendant.)	

RESPONSE TO DEFENDANT’S MOTION FOR PRETRIAL RELEASE

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and requests that this Honorable Court deny defendant’s motion for pretrial release because there are no conditions or combinations of conditions that will reasonably assure the defendant’s presence or protect the community.

As an initial matter, the government states that defendant is not eligible for release in criminal case number 4:16CR00281 HEA. The government notes that when defendant was ordered detained by the Honorable Noelle C. Collins, the magistrate judge found that defendant posed a risk of flight and danger to the community if she was released. DCD 85, criminal case number 4:16CR00281 HEA, p. 2. In particular, the court found the following reasons supporting detention:

- prior criminal history;
- participation in criminal activity while on probation, parole or supervision, lack of a stable residence;
- use of aliases or false documents; and,

- prior violations of probation, parole, or supervised release.

DCD 85, criminal case number 4:16CR00281 HEA, pp. 2-3.

On October 15, 2018, prior to the revocation hearing in criminal case number 4:16CR00281 HEA, a bond report was completed in the underlying criminal case. DCD 8. The pretrial services officer noted that defendant was ineligible for release. DCD 8, p. 1. If her circumstances were to change, the author noted that the Federal Pretrial Service would continue recommending detention. DCD 8, p. 1.

On November 7, 2018, the Honorable Judge Henry E. Autrey imposed an eight month sentence after revoking her term of supervised release. DCD 97, criminal case number 4:16CR00281 HEA. Because defendant was detained on July 15, 2018, her term of supervision is not set to expire until March 15, 2019. DCD 74, criminal case number 4:16CR00281 HEA.

Finally, the government submits that defendant has neglected to submit any documentation that her medical needs cannot be handled while incarcerated, or that the paperwork required for the adoption of her child cannot be accomplished during her detention.

Accordingly, the government respectfully requests that this Honorable Court deny defendant's motion for pretrial release because she poses a danger to the community and a risk of flight if she is released.

Respectfully submitted,

JEFFREY B. JENSEN
UNITED STATES ATTORNEY

/s/ Tracy L. Berry
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CERTIFICATE OF SERVICE

Copy of the foregoing was forwarded through the Court's electronic case filing system
this 14th day of February, 2019, to: Aryka Moore, Esq.

s/ Tracy Lynn Berry
ASSISTANT UNITED STATES ATTORNEY